

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA  
(PHILADELPHIA)**

IN RE:

**Henry Bedford aka Andrei Losev dba Hot  
Rod Motors and Lars Group, Inc.  
Debtor**

CHAPTER 13

CASE NO.: 19-16254-amc

HEARING DATE: 06/18/2024

HEARING TIME: 11:00am

HEARING LOCATION: Courtroom #4

**MOTION OF NEWREZ LLC D/B/A SHELLPOINT MORTGAGE SERVICING AS  
SERVICER FOR US BANK TRUST NATIONAL ASSOCIATION, NOT IN ITS  
INDIVIDUAL CAPACITY BUT SOLELY AS OWNER TRUSTEE FOR VRMTG ASSET  
TRUST FOR LOAN MODIFICATION AGREEMENT APPROVAL REGARDING 66  
CARMELITA DR, RICHBORO, PA 18954**

AND NOW COMES, NewRez LLC d/b/a Shellpoint Mortgage Servicing (“New Rez”) as servicer for US Bank Trust National Association, not in its individual capacity but solely as Owner Trustee for VRMTG Asset Trust (“Movant”), by and through its attorneys, Hill Wallack LLP, and respectfully represents as follows:

1. This Motion (the “Motion”) is filed by Movant for approval of the loan modification agreement offered to Henry Bedford fka Andrei Losev (“Borrower”) regarding real property located at 66 Carmelita Dr, Richboro, PA 18954 (the “Mortgaged Premises”).

2. NewRez LLC d/b/a Shellpoint Mortgage Serving, the mortgage servicer, has agreed that the loan modification agreement on the Mortgaged Premises would be allowed. A true and correct copy of the Loan Modification Agreement is attached hereto and made a part hereof as Exhibit “A.”

3. One of the conditions for giving this loan modification agreement is that the approval of the Bankruptcy Court be obtained in allowing the Debtor to obtain.

4. The incurring of this loan modification is beneficial to all parties in this case in that it will permit NewRez LLC d/b/a Shellpoint Mortgage Servicing to get paid and permit the

Debtor to live in and to keep the Mortgaged Premises without facing the threat of a Sheriff Sale of the home, and it may also permit other claims to continue to receive payments from the trustee since the Debtor is still under the Chapter 13 Plan.

WHEREFORE, NewRez LLC d/b/a Shellpoint Mortgage Servicing, respectfully requests that this Court enter an Order permitting the loan modification on the Mortgaged Premises.

Respectfully submitted,

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